

Docket No. F-7051

Ser. No. 09/935,222

**REMARKS**

Claims 1-4 remain pending in this application. Claims 1-4 are rejected. Claims 5- 24 are previously cancelled herein. Claim 1 is amended herein to clarify the invention.

**CLAIM REJECTIONS UNDER 35 U.S.C. §103(a)**

Claims 1-4 are now rejected under 35 U.S.C. §103(a) as obvious over the Mozer, Bain, Xin, Scott and the newly applied Cole reference. The applicant herein respectfully traverses this rejection. For a rejection under 35 U.S.C. §103(a) to be sustained, the differences between the features of the combined references and the present invention must be obvious to one skilled in the art.

The Examiner now cites the Cole reference for the teaching of a conductive button. However, this reference still fails to provide the teaching noted missing in the filed December 20, 2006. Namely, the references do not provide the direction for one to chose to make the *call* button a conductive button. The Cole reference does not address the glaring deficiency regarding the lack of any teaching of or suggestion to provide a conductive call button with relation to a fingerprint input device. Namely, the present invention of claim 1 utilizes the *call* button as a static discharge part thereby requiring a visitor to effect static discharge without conscious effort.

Docket No. F-7051

Ser. No. 09/935,222

Using such a button as a call button is a feature which would not be known to those skilled in the art nor readily evident. This is because the discharge function is for using the fingerprint reader and there is no functional connection to simply making a call by itself using the call button. The people who live at the residence and wish to use the fingerprint input device to open the door would have no reason to use the call button because they would not call themselves. Those people visiting and merely wishing to speak to the occupant or leave a message have no reason to input a fingerprint because they are there to gain entry. Thus, there is no necessary functional connection which always applies between using the call button to make a call and inputting a fingerprint to gain access.

A different situation would exist if the conductive button was an activator button for the fingerprint reader. However, this is not the case. It is only the applicant's present disclosure which makes the leap to incorporate the discharge function into a *call* button.

It is again submitted that the Examiner makes the assertion that it would be obvious to use conductive material to provide a ground connection to prevent damaging "circuitry within the access control unit" without prior art support. The Examiner cites the Scott reference for teaching a fingerprint input device used to control access. Yet nothing in the Scott reference suggests such circuitry is susceptible to static damage. In this regard there is no suggestion to provide any

Docket No. F-7051

Scr. No. 09/935,222

method for discharge provided by the Scott art, much less a discharge avenue provided in a call button as claimed.

The Examiner has cited the Bain reference for teaching a message input button. The Bain disclosure is silent on any alternative functioning of the message input button besides the activation of the equipment to receive a message. Thus, there is no suggestion that a button may be made conductive to effect *both* an active equipment operation function such as recording a message or making a call *and* a discharging function for a fingerprint input device. This dual functionality of the claimed call button is not hinted at by either the Bain or the Scott references nor any of the other applied references.

Furthermore, the applied references do not suggest the configuration of the call button now recited in claim 1. The call button configuration of claim 1 includes:

the outdoor unit having a housing including a front wall defining a call button aperture, and a base panel within said housing and opposing a front wall inner surface of the front wall, said base panel being a circuit board carrying contacts,

the call button body being disposed in the call button aperture and having at least a portion thereof disposed between the front wall inner surface and the base panel, the body extending from the front wall inner surface toward the base panel and having a flange portion engageable with said front wall inner surface and a movable contact opposing said base panel,

a spring interposed between the flange portion of the call button body and the base panel to bias the call button toward the front wall of the housing,

Docket No. F-7051

Ser. No. 09/935,222

the base panel having a panel front surface with a fixed contact disposed thereon opposite to the movable contact and a grounded conductive part also formed on the panel front surface, and

the call button body being electrical connected by a connection line to the grounded conductive part.

In contrast, the Cole reference teaches that a spring 60 is disposed between a body 26 of a switch 20 and an actuator 52 and does not teach relationship between the spring and a base panel in a housing. Therefore, Cole does not teach a spring interposed between a flange portion of the button body and a base panel so as to bias the call button toward the housing as recited in claim 1 of the present invention.

Further, Cole teaches that the switch 20 is electrically connected to the housing 22 or other ground. Cole, however, does not teach a "grounded conductive part formed on the panel front surface" and that a "fixed contact disposed thereon opposite to the movable contact" of the call button body is also disposed on the panel front surface which is the same surface of the base panel that the "grounded conductor part" is formed on with the "grounded conductor part" being electrically connected to the call button body.

The present invention of claim 1 has the housing and the base panel disposed opposite to the front wall inner surface of the housing, and has a portion the call button body between the front wall and the base panel. Still further, it does not teach interposing a spring between the flange portion of the call button body

Docket No. F-7051

Ser. No. 09/935,222

and the base panel wherein the fixed contact, opposing the movable contact of the call button body, is disposed on the panel front surface of the base panel.

Therefore, the base panel of the present invention is a circuit board and functions as a spring base such that the spring biases the button body toward the front wall of the housing. Namely, the base panel that is the circuit board can be utilized as the spring base.

On the premise of above, the present invention of claim 1 further forms the fixed contact and the grounded conductive part on the same surface of the base panel and connects the call button body to the grounded conductive part. For this structure, the conductive part can be divided from the housing to improve the degree of freedom in selection of material of the housing and the conductive part can be easily formed together with a circuit on the base panel.

In contrast, Cole disposes the spring 60 between the body 26 of the switch 20 and the actuator 52. Cole does not show a relationship between the spring and a base panel which is a circuit board. Therefore, Cole does not teach that a spring is interposed between the flange portion of the button body and a base panel which is a circuit board, and cannot utilize a base panel that is a circuit board as the spring base.

On the other hand, Cole has the switch 20 made of conductive material and connects the switch to the housing 22 or other ground. However, Cole does not teach that the switch 20 is grounded within the housing 22 and said other ground

Docket No. F-7051

Ser. No. 09/935,222

is formed on a base panel and arranged on the same surface of the base panel as the circuit of the base panel including the fixed contact.

Therefore, Cole cannot divide the conductive part from the housing to improve the degree of freedom in selection of material of the housing and easily form the conductive part together with a circuit of a base panel, on the premise of a structure utilizing a base panel, which is the circuit board, as a spring base.

With regard to claim 4 and 5, it is further submitted that the Examiner has not stated a *prima facie* case of obviousness. It appears that the Examiner has apparently overlooked that the image recording means and display means is claimed as part of the handheld portable indoor unit. In contrast, the Xin reference merely discloses a VCR which drives a display which is mounted near the door. Hence, it does not support the Examiner's rejection.

Thus, it is respectfully submitted that the rejected claims are not obvious in view of the cited reference(s) for the reasons stated above. Reconsideration of the rejections of claims 1-4 and their allowance are respectfully requested.

#### REQUEST FOR EXTENSION OF TIME

RECEIVED  
CENTRAL FAX CENTER

AUG 20 2007

Docket No. F-7051

Ser. No. 09/935,222

Applicant respectfully requests a one month extension of time for responding to the Office Action. Please charge the fee of \$60.00 for the extension of time to Deposit Account No. 10-1250.

If there is any discrepancy between the fee(s) due and the fee payment authorized the USPTO is hereby authorized to charge any fee(s) or fee(s) deficiency or credit any excess payment to Deposit Account No. 10-1250.

RECEIVED  
CENTRAL FAX CENTER

AUG 20 2007

Docket No. F-7051

Ser. No. 09/935,222

In light of the foregoing, the application is now believed to be in proper form  
for allowance of all claims and notice to that effect is earnestly solicited.

Respectfully submitted,  
JORDAN AND HAMBURG LLP

By C. Bruce Hamburg  
C. Bruce Hamburg  
Reg. No. 22,389  
Attorney for Applicants  
and, *by H.F. Ruschmann*  
*Reg 35,341*

By H.F. Ruschmann  
Herbert F. Ruschmann  
Reg. No. 35,341  
Attorney for Applicants

Jordan and Hamburg LLP  
122 East 42nd Street  
New York, New York 10168  
(212) 986-2340